

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

LUCIA A. FRIAZ, ET AL.,

Plaintiffs,

v.

**GULF COAST MARINE & ASSOCS.,
INC., ET AL.,**

Defendants.

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Civil Action No. 9:09-CV-162 (TJW)

STIPULATION OF DEFENDANTS REGARDING DISMISSAL

COME NOW, Defendants Gulf Coast Marine & Associates, Inc., Halliburton Energy Services, Inc., f/k/a Halliburton Company, Schlumberger Technology Corporation, and Matthews Daniel Company (collectively, “Defendants”), and file their stipulation in accordance with the Court’s Memorandum Opinion and Order conditionally granting Defendants’ Consolidated Motion to Dismiss for *Forum Non Conveniens*. (Docket Entry 118.)

STIPULATIONS

In the event the Plaintiffs in this lawsuit refile any of their claims arising from the allegations set forth in their Complaint in a Mexican court, Defendants hereby stipulate to the following:

1. Defendants agree to appear and submit themselves to the jurisdiction of a Mexican federal or state court, waiving any jurisdictional defenses they might normally possess.
2. Defendants agree to waive any statute of limitations or laches defense that they did not possess as of the date this lawsuit was originally filed.
3. Defendants agree to submit to discovery in the Mexican forum in accordance with the procedural rules of the Mexican court.

4. Defendants agree that they will make all relevant witnesses and documents available in Mexico to the extent consistent with Mexican law.
5. Defendants further agree that they will make any employee witness available for trial in Mexico to the extent consistent with Mexican law.

Dated: April 29, 2011

Respectfully submitted,

/s/ Hugh E. Tanner

Hugh E. Tanner

Texas Bar No. 19637400

MORGAN, LEWIS & BOCKIUS LLP

1000 Louisiana St., Suite 4200

Houston, TX 77002-5006

Telephone: (713) 890-5000

Fax: (713) 890-5001

htanner@MorganLewis.com

ATTORNEY-IN-CHARGE FOR DEFENDANT
SCHLUMBERGER TECHNOLOGY
CORPORATION

/s/ Michael D. Williams*

Michael D. Williams

Texas Bar No. 21564330

BROWN SIMS, P.C.

1177 West Loop South, 10th Floor

Houston, Texas 77027-9007

Telephone: (713) 629-1580

Facsimile: (713) 629-5027

ATTORNEY-IN-CHARGE FOR DEFENDANT
GULF COAST MARINE & ASSOCIATES, INC.

/s/ R. Bruce Hurley*

R. Bruce Hurley
State Bar No. 10311400
KING & SPALDING
1100 Louisiana, Suite 3300
Houston, Texas 77002-5219
Telephone: 713.751.3200
Fax: 713.751.3290

ATTORNEY-IN-CHARGE FOR DEFENDANT
HALLIBURTON ENERGY SERVICES, INC.
F/K/A HALLIBURTON CO.

/s/ Mark C. Clemer*

Mark C. Clemer
Texas Bar No. 04372300
Brown Sims, P.C.
1177 West Loop South, Tenth Floor
Houston, Texas 77027
[t] 713-629-1590
[f] 713-629-5027
mclemer@brownsims.com

ATTORNEY-IN-CHARGE FOR DEFENDANT
MATTHEWS DANIEL COMPANY

*Signed by Hugh E. Tanner with express permission.

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of April, 2011, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Hugh E. Tanner

Hugh E. Tanner